

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. __06-_____
v.	:	DATE FILED: _____
AKINTUNDE CRAWFORD,	:	VIOLATIONS:
a/k/a “Raheem”	:	18 U.S.C. § 1343 (wire fraud - 1 count)
	:	18 U.S.C. § 1028A (aggravated identity theft - 1 count)
	:	18 U.S.C. § 2 (aiding and abetting)
		Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. Tri-State Auto (“Tri-State), 6626 N. Broad Street, Philadelphia, Pennsylvania was engaged in the business of selling cars. As a car dealership, the business sought loans and leases for buyers of the cars. To process the loan and lease applications, the dealership required a loan application be completed with the correct personal identification of the applicant.

2. Tri-State submitted information from the completed loan applications via the internet to find a lender. Based on the applicant’s representations, lending institutions acted on the application.

THE SCHEME

3. On or about August 20, 2004 in Philadelphia, in the Eastern District of Pennsylvania and elsewhere, defendant

AKINTUNDE CRAWFORD

devised and intended to devise a scheme to defraud a car dealership and loan institution, and to obtain property by means of false and fraudulent pretenses, representations, and promises.

MANNER AND MEANS

It was part of the scheme that:

4. Defendant AKINTUNDE CRAWFORD fraudulently used the stolen identity of M.B. to attempt to obtain a car loan.

5. The true M.B. lives in Yardley, Pennsylvania and did not give defendant AKINTUNDE CRAWFORD or anyone else anyone permission to use his name or personal information to purchase a car in Pennsylvania.

6. On or about August 20, 2004, defendant AKINTUNDE CRAWFORD appeared at Tri-State to buy a 2003 Hummer-HR valued at \$49,818.50. Defendant CRAWFORD fraudulently completed a loan application using the stolen identity of M.B., including his social security number and date of birth, and signed all documents with the name of M.B.

7. Tri-State then utilized an internet cite, www.dealertrack.com to process defendant AKINTUNDE CRAWFORD's fraudulent loan application in the name of M.B. Dealertrack utilizes the internet to link automotive dealers with banks, finance companies, credit unions and other financing sources and information providers, such as the major credit reporting agencies.

8. As a result of the fraudulent Tri-State application, a loan for \$36,500 was approved.

9. On or about August 20, 2004, in Philadelphia, in the Eastern District of Pennsylvania and elsewhere, defendant

AKINTUNDE CRAWFORD,

for the purpose of executing the scheme described above, caused to be transmitted signs and signals by means of wire communication in interstate commerce via the internet between Tri-State in Philadelphia, Pennsylvania and www.dealerstrack.com, which is located in New York.

All in violation of Title 18, United States Code, Sections 1343 and 2.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 20, 2004 in Philadelphia, in the Eastern District of Pennsylvania and elsewhere, defendant

AKINTUNDE CRAWFORD

knowingly and without lawful authority transferred, possessed, and used a means of identification of, another person, that is, the name, social security number, and date of birth of M.B. during and in relation to a wire fraud, in violation of Title 18, United States Code, Section, 1343.

In violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5) and 2.

NOTICE OF FORFEITURE

1. As a result of the violation of Title 18, United States Code, Section 1343, described in Count One of this indictment, defendant

AKINTUNDE CRAWFORD

shall forfeit to the United States of America, any property, real or personal, which constitutes or is derived from proceeds traceable to any offense constituting “specified unlawful activity,” i.e., wire fraud, including, but not limited to the following:

A. The sum of \$49,818.50 in United States currency (forfeiture money judgment).

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 981 and Title 28, United States Code, Section 2461.

A TRUE BILL:

GRAND JURY FOREPERSON

PATRICK L. MEEHAN
United States Attorney